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Attorneys for Defendant Adam Shafi

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM SHAFI,

Defendant

) NO. 15 Cr. 582 WHO

) STIPULATED MOTION AND
) [PROPOSED] ORDER TO CONTINUE
) PRETRIAL CONFERENCE

The parties stipulate that the initial CIPA § 2 pretrial conference be continued from May 12, 2016 at 1:30 p.m. to June 16, 2016 at 1:30 p.m. The parties agree that this stipulated motion to continue the pre-trial conference may be granted based on this stipulated motion and the declaration of counsel below, and without oral argument.

Declaration of Counsel

1. Along with Erik B. Levin, I represent Mr. Adam Shafi in the above-captioned matter and I submit this declaration based on information and belief.

2. The initial CIPA § 2 pretrial conference is currently scheduled for May 12, 2016.

3. The parties have agreed to continue the pretrial conference until the Court's June 16, 2016, calendar, based on the Court's unavailability on June 2, 2016, and the Court's full docket on June 9, 2016.

4. The parties agree that the nature of the prosecution (i.e., terrorism charge involving Foreign Intelligence Surveillance Act information) makes the case "complex" under the Speedy Trial Act. The parties further agree that discovery is ongoing and that additional time is required for effective preparation of counsel.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of May, 2016, at New York, New York.

/s/ Joshua L. Dratel
Joshua L. Dratel

1 IT IS SO STIPULATED.

2 DATED: 5/5/16

3 BRIAN J. STRETCH

4 Acting United States Attorney

5 /s/ S. Waqar Hasib

S. Waqar Hasib, Esq.

Assistant United States Attorney

6 /s/ Joshua L. Dratel

7 Joshua L. Dratel, Esq.

Counsel for Adam Shafi

8 /s/ Erik B. Levin

Erik B. Levin, Esq.

Counsel for Adam Shafi

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2 DATED:

3 JUDGE WILLIAM H. ORRICK

Certificate of Service

I hereby certify that on May 5, 2016, I filed the foregoing **Stipulated Motion And [Proposed] Order To Continue the Pretrial Conference** with the Clerk of the United States District Court for the Northern District of California by using the CM/ECF system.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 5, 2016.

/s/ Joshua L. Dratel
Joshua L. Dratel, Esq.